

FILED

JAN 23 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

) 4 : 25 CR 00026

v.

) CASE NO.

ANDRE L. BOWERS,

) Title 21, United States Code,
Sections 841(a)(1), (b)(1)(A),
(b)(1)(C) and 846

Defendant.

JUDGE BARKER

COUNT 1

(Attempted Possession with Intent to Distribute Cocaine,
21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(A))

The Grand Jury charges:

1. On or about January 6, 2025, in the Northern District of Ohio, Eastern Division, Defendant ANDRE L. BOWERS did knowingly and intentionally attempt to possess with the intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1) and (b)(1)(A).

COUNT 2

(Possession with Intent to Distribute Cocaine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

2. On or about January 6, 2025, in the Northern District of Ohio, Eastern Division, Defendant ANDRE L. BOWERS did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

The Grand Jury further charges:

3. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853 the allegations of Counts 1 and 2 are incorporated herein by reference. As a result of the foregoing offenses, Defendant ANDRE L. BOWERS shall forfeit to the United States any and all property constituting or derived from any proceeds he obtained directly or indirectly as a result of such violations, and any property used or intended to be used in any manner or part to commit or to facilitate the commission of the such violations.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.